

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

RECEIVED
Nov 16 4 07 PM '01
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSE OF UNITED STATES POSTAL SERVICE
WITNESS MEEHAN TO INTERROGATORIES OF
UNITED PARCEL SERVICE
(UPS/USPS-T11-3-4)

The United States Postal Service hereby provides the responses of witness Meehan to the following interrogatories of United Parcel Service: UPS/USPS-T11-3-4, filed on November 1, 2001.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking:


Susan M. Duchek

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2990; Fax -5402
November 16, 2001

Response of United States Postal Service Witness Meehan
to
Interrogatories of United Parcel Service

UPS/USPS-T11-3. Provide the total cost incurred in Fiscal Year 2000 for training Postal Service Window Service personnel. Provide a reference, including page numbers, for your answer.

Response:

Window service training is not separately reported in the Fiscal Year 2000 CRA. USPS-LR-J-1, the Summary Description of USPS Development of Costs by Segments and Components Fiscal Year 2000, at pages 3-19 (top at 3) and 3-20 (top at 3), contains a discussion of window service training, which is included with those of safety, administrative and clerical work in addition to processing and special service training. The same rationale is applied to this component 470 for Base Year 2000, and can be found in my Workpaper A-2 at pages 39 and 40, column 2, where I show "Training Other" whose total is \$106,387(000). Of this total, \$81,741(000) is volume variable and distributed to classes of mail and special services.

Response of United States Postal Service Witness Meehan
to
Interrogatories of United Parcel Service

UPS/USPS-T11-4. Provide the attribution of Window Service training costs to Postal Service products. If the Window Service training costs are not attributed, has the Postal Service studied Window Service training costs to determine whether or not it is possible to attribute them? If the Postal Service has not studied attribution of Window Service training costs, why not?

Response:

See my response to your UPS/USPS-T11-3.

DECLARATION

I, Karen Meehan, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Karen Meehan

Dated: 11/16/01

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



Susan M. Duchek

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2990; Fax -5402
November 16, 2001